

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re TERRORIST ATTACKS ON SEPTEMBER 11, 2001

ESTATE OF ALICE HOGLAN, BY ITS PERSONAL
REPRESENTATIVE CANDYCE S. HOGLAN, ET. AL.,

Plaintiffs-Judgment Creditors,

v.

OAKTREE CAPITAL MANAGEMENT, LP; FLEETSCAPE
CAPITAL HOLDINGS LIMITED; AND FLEETSCAPE SUEZ
RAJAN LLC;

Garnishee.

Case No. 03-md-1570 (GBD)(SN)

Case No. 11-cv-7550 (GBD)(SN)

**SUPPLEMENTAL
DECLARATION OF DOUGLASS
A. MITCHELL IN SUPPORT OF
THE HOGLAN CREDITORS'
MOTION FOR TURNOVER OF
ASSETS FROM GARNISHEES
OAKTREE CAPITAL
MANAGEMENT, LP,
FLEETSCAPE CAPITAL
HOLDINGS LIMITED, AND
FLEETSCAPE SUEZ RAJAN LLC**

I, Douglass A. Mitchell, hereby declare:

1. I am an attorney duly licensed to practice law in the state of Nevada and admitted to the bar of this Court *pro hac vice*. I am a partner with Jenner & Block LLP, counsel to Judgment Creditors Alice Hoglan, et al. (the “Hoglan Creditors”) in the above-captioned action. I make this supplemental declaration in support of the Hoglan Creditors’ turnover motion, to be filed in connection with the Hoglan Creditors’ reply to Respondents’ opposition. Except for those matters on information and belief, which I believe to be true, I have firsthand knowledge of the contents of this declaration and I could testify thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of a screen capture of Fleetscape Suez Rajan LLC’s report from IHS Maritime, captured on March 8, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of a screen capture of the California Secretary of State's Uniform Commercial Code database search for "Fleetscape Suez Rajan," captured on April 24, 2022 and available at <https://bizfileonline.sos.ca.gov/search/ucc>.

4. Attached hereto as **Exhibit C** is a true and correct copy of a press release from Ince & Co, released via Impact Financial News, entitled "Court considers termination provisions and equitable relief against forfeiture under bareboat charters," dated April 11, 2022. I have also reviewed documents from the United Kingdom litigation described in the article.

5. Attached hereto as **Exhibit D** is a true and correct copy of a screen capture of an email exchange between counsel for the Hoglan Creditors and counsel for Respondents with the subject "Suez Rajan," dated April 21, 2022 and April 22, 2022.

I declare that the foregoing is true under penalty of perjury of the laws of the United States.

Executed this 25th day of April, 2022 at New York, NY.

By: 
Douglass A. Mitchell